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Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-VCF

**Unopposed Motion for Extension of
Time**

(Fifth Request)

The Federal Defendants respectfully move for a 60-day extension of time, from December 20, 2023, to February 20, 2024, to file a response to Plaintiff's Complaint (ECF No. 1). This is the fifth request for an extension of time. Undersigned defense counsel has inquired with Plaintiff's counsel, who agrees with this request. Indeed, Plaintiff's counsel would like additional time to continue consultation with the client and the potential preparation of documents that may be submitted to the agency.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, the parties continue to assess recent developments at the agency level. Plaintiff and her counsel continue to consult including as

1 to additional documents that may be sent to the agency. Defense counsel has a number of
2 pressing matters in other cases including a reply in support of a Motion for Summary
3 Judgment due on December 26, 2023.

4 This motion is filed in good faith and not for the purposes of undue delay.
5 Accordingly, Federal Defendants respectfully request, and Plaintiff's counsel consents to,
6 this extension of time, from December 20, 2023, to February 20, 2024, to file a response to
7 Plaintiff's Complaint.

8 Respectfully submitted this 20th day of December 2023.

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ Patrick A. Rose
12 PATRICK A. ROSE
13 Assistant United States Attorney

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15 **IT IS SO ORDERED**

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17 **UNITED STATES MAGISTRATE JUDGE**

18 **DATED:** December 21, 2023
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